

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)	FINDING OF VIOLATION
)	EPA-5-00-IL-14
Senior Flexonics, Inc.)	
300 East Devon Avenue)	
Bartlett, Illinois)	
)	
Proceedings Pursuant to)	
Sections 112 and 113 of the)	
Clean Air Act, 42 U.S.C. §§ 7412)	
and 7413.)	

FINDING OF VIOLATION

Pursuant to Section 113(a)(3) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(3), the United States Environmental Protection Agency (U.S. EPA) hereby notifies the State of Illinois and Senior Flexonics, Inc., (Flexonics) that the U.S. EPA, by authority duly delegated to the undersigned, finds Flexonics's facility, located at 300 East Devon Avenue, Bartlett, Illinois, to be in violation of Section 112 of the Act, 42 U.S.C. § 7412, and the regulations promulgated thereunder at 40 C.F.R. Part 63, Subpart T, which set forth the National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning, 40 C.F.R. §§ 63.460-469.

Factual Background

1. Flexonics owns and operates a Batch Vapor Cleaning Machine, which was installed in 1986 and therefore is an existing machine. 40 C.F.R. § 63.461.
2. The existing Batch Vapor Cleaning Machine uses trichloroethylene as its cleaning agent in a total concentration greater than 5% by weight. 40 C.F.R. § 63.460(a).
3. The existing Batch Vapor Cleaning Machine was required to achieve compliance with Subpart T provisions no later than December 2, 1997. 40 C.F.R. § 63.460(d).

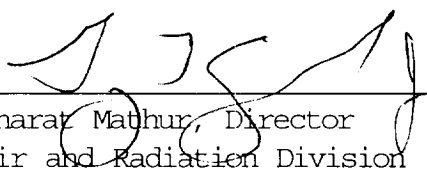
4. In accordance with 40 C.F.R. § 63.463(b)(2) and as specified in Flexonics's initial notification report for its existing Batch Vapor Cleaning Machine submitted on August 14, 1995, Flexonics selected the following control combinations for its existing Batch Vapor Cleaning Machine, which has a solvent-air interface area of greater than 1.21 square meters (13 square feet): freeboard refrigeration device, reduced room draft, and dwell.
5. On October 22, 1999, a U.S EPA inspector inspected Flexonics' facility located at 300 East Devon Avenue, Bartlett, Illinois for compliance with 40 C.F.R. Part 63 Subpart T.

Violations

6. From December 2, 1997 to present, in violation of 40 C.F.R. § 63.463(a)(1), Flexonics failed to ensure that the Batch Vapor Cleaning Machine was designed or operated to achieve a reduced room draft, as described in 40 C.F.R. § 63.463(e)(2)(ii).
7. From December 2, 1997 to present, in violation of 40 C.F.R. § 63.463(d)(1), Flexonics failed to control air disturbances across the cleaning machine openings by reducing the room draft, as described in 40 C.F.R. § 63.463(e)(2)(ii).
8. From December 2, 1997 to present, in violation of 40 C.F.R. §§ 63.463(e)(1) and 63.466(a)-(d), Flexonics failed to conduct monitoring of each control device used to comply with 40 C.F.R. § 63.463, as provided in 40 C.F.R. § 63.466.
9. From December 2, 1997 to present, in violation of 40 C.F.R. § 63.463(e)(2), Flexonics failed to determine during each monitoring period whether each control device used to comply with 40 C.F.R. § 63.463 met the requirements specified in 40 C.F.R. § 63.463(e)(2). As a result, an exceedance occurred pursuant to 40 C.F.R. § 63.463(e)(3) since the conditions of 40 C.F.R. § 63.463(e)(2) have not been met.
10. From December 2, 1997 to present, in violation of 40 C.F.R. § 63.465(e), Flexonics failed to determine its potential to emit from all solvent cleaning operations, as specified in 40 C.F.R. § 63.465(e)(1).
11. From December 2, 1997 to present, in violation of 40 C.F.R. § 63.467, Flexonics failed to maintain records, as specified in § 63.467(a)(3), (b)(1), and (b)(2).

12. From March 30, 1998 to present, in violation of 40 C.F.R. §§ 63.463(e)(4) and 63.468(h), Flexonics failed to submit exceedance reports to the Administrator on a quarterly basis, as specified in 40 C.F.R. § 63.468(h).

3/17/00
Date

 FOR
Bharat Mathur, Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, do hereby certify that a Finding of Violation was sent
by Certified Mail, Return Receipt Requested, to:

Mark A. Glawe, Plant Facilities Manager
Senior Flexonics, Inc.
300 East Devon Avenue
Bartlett, Illinois 60103


I also certify that a copy of the Finding of Violation was sent by first
class mail to:

David Kolaz, Manager
Compliance and Systems Management Section
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

and

Harish Narayen, Acting Regional Manager
Illinois Environmental Protection Agency, Region 1
1701 S. First Avenue
Maywood, Illinois 60153

on the 18th day of February, 2000.


Betty Williams, Secretary
AECAS (IL/IN)

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CERTIFIED MAIL RECEIPT NUMBER